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June 24, 2003

DEPT. OF TRANSPORTATION
2003-14375

Docket Management
Room PL-401
400 Seventh St. S.W.
Washington, DC 20590

2003 JUN 29 PM 3:06

Re: Docket NHTSA 2003-14375 - 32

Ladies and Gentlemen,

At our last Board of Directors meeting, the Massachusetts Motorcycle Association (MMA) discussed NHTSA's proposal to study the "Characteristics of Motorcycle Operators." We in the MMA feel that simply interviewing 4000 riders from 7 states for about 12 minutes will in no way reflect true riders' characteristics and the motorcycle riding community, and therefore we feel that this study is a waste of taxpayers' money. In the year 2000, there were approximately 4.4 million registered motorcycles in the United States. If NHTSA does a study of only 4000 motorcyclists, you are interviewing only .09 % of the motorcycling community. There is no way that less than 1/10 of one percent can be considered a measuring stick by which NHTSA can "develop effective programs that can reduce the incidence of these crashes." Please, for the real safety of motorcyclists, if you are going to do a true study of the motorcycling community, we ask that you do a study that will involve a much larger number of motorcyclists.

The MMA would support a large-scale, comprehensive study involving the majority of motorcyclists, but we cannot support this study as it is currently proposed by NHTSA. Like NHTSA, we are also concerned about the increase in fatalities in recent years. However, as I read your proposal, I am curious that of all the reasons that NHTSA stated for the increase in fatalities, such as older riders, alcohol, and larger motorcycles, NHTSA never once mentions the popularity of motorcycling in the last 10 years and how the total number of motorcycles on the roadways of America has increased by approximately 30%.

As a registered motorcyclist in the Commonwealth of Massachusetts, I am constantly receiving mailings from motorcycle related industries and businesses. I feel that NHTSA also has easy access to the mailing addresses of all registered motorcyclists in the United States and feel that by accessing this information and then sending out a written study to more motorcycle riders than .09% - in more than 7 states - you will get a better reflection of the "Characteristics of Motorcycle Operators."

After having also read the Motorcycle Riders Foundation's public comments to NHTSA about this proposed study, the MMA concurs with the MRF's stand on this study.

In closing, we in the MMA ask NHTSA to abandon this proposed method of studying the "Characteristics of Motorcycle Operators" and take the time to figure out a way to do a true study of all/more motorcyclists in the United States. Thank you for allowing us in the motorcycling community this opportunity to express our concerns regarding NHTSA's proposed study.

Sincerely,

James Ricci, Chairman
MMA of Massachusetts